

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

LUCINDA M. YAZZIE,

Plaintiff,

v.

No. 10-CV-292 BB/LFG

LAW OFFICES OF FARRELL & SELDIN,

Defendant.

**PLAINTIFF'S PROPOSED SUPPLEMENTAL
JURY INSTRUCTION WITH CITATIONS**

INSTRUCTION NO. 21

In addition to the requirements set forth in the previous instruction, for the Law Offices of Farrell & Seldin to prevail under its bona fide error defense, it must prove that the procedures that it contends were reasonably adapted to avoid the violations of law at issue included a safety catch or rechecking mechanism.

Citation: *Gallegos v. Stokes*, 593 F.2d 372, 376 (10th Cir. 1979); *Mirabal v. General Motors Acceptance Corporation*, 537 F.2d 871, 878 (7th Cir. 1976); *Jerman v. Carlisle, McNellie, Rini, Kramer & Ulrich LPA*, ___ U.S. ___, 130 S.Ct. 1605, 176 L.Ed.2d 519 (2010).

Respectfully submitted:

TREINEN LAW OFFICE, Attorneys for Plaintiff

/s/ Rob Treinen

ROB TREINEN
500 Tijeras Ave NW
Albuquerque, New Mexico 87102
(505) 247-1980
(505) 843-7129 (fax)

I certify that I served a copy of the foregoing pleading by mailing and emailing the same to Jack Brant, attorney for Defendants Law Offices of Farrell & Seldin and Target National Bank, at Law Office of Jack Brant PC, 22 Tulane Dr SE, Albuquerque, New Mexico 87106-1414, email: jack@jackbrantlaw.com, on July 26, 2011.

/s/ Rob Treinen

ROB TREINEN